

**IN THE UNITED STATES DISTRICT COURT FOR
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUINTRELL MARTIN,

Defendant.

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Case No. 2:06-cr-0155-MHT-SRW

MOTION TO CONTINUE JANUARY 25, 2007 CHANGE OF PLEA HEARING

COMES NOW, the defendant, Quintrell Martin, by and through the undersigned attorney, Richard K. Keith, and moves this Honorable Court to continue the January 25, 2007 Change of Plea Hearing in the above-styled cause.

As grounds in support thereof, the following is stated:

1. On January 23, 2007, the defendant filed his Notice of Intent to Change Plea and the Court set the same for a hearing on January 25, 2007, at 3:30 p.m.
2. The undersigned has a previously scheduled appointment at Donaldson Correctional Facility at 1:30 p.m. on Thursday, January 25, 2007, in Bessemer, Alabama.
3. Additionally, the undersigned has pre-registered and pre-paid to attend the Alabama Criminal Defense Lawyers Association (ACDLA) seminar in Birmingham, Alabama, January 25 – 26, 2007.

WHEREFORE, premises considered, the defendant moves that the January 25, 2007 Change of Plea Hearing be continued.

Respectfully submitted this 23rd day of January, 2007.

s/ Richard K. Keith
RICHARD K. KEITH (KEI003)
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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Verne Speirs, AUSA
Post Office Box 197
Montgomery, AL 36101-0197

John T. Harmon, AUSA
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s/ Richard K. Keith
OF COUNSEL